

### REMARKS

Claims 1-58 are pending, with claims 1, 19, 37, and 55 being independent. Claims 1, 3-11, 19, 21-29, 37, 39-47, and 55 have been amended.<sup>1</sup> No new matter has been introduced.

### Interview

Applicants would like to thank Examiner Champagne for the courtesy of an interview conducted on October 14, 2009. This reply reflects the substance of the interview.

### Rejection under 35 U.S.C. § 102(e)

Claims 1, 2, 5-11, 18-20, 23-29, 36-38, 41-47, 54 and 55 stand rejected under 35 U.S.C. §102(e) as being anticipated by Roth et al. (US Publication No. 2006-00285987). This rejection is obviated by virtue of the amendments to independent claims. Specifically, Roth fails to describe or suggest, “generating a watch list of users to receive re-targeted advertisements ... and selecting, in response to the request, advertising content for display based upon determining that the user appears in the watch list of users to receive re-targeted advertisements,” as required by amended independent claim 1.

Amended claim 1 recites a method for online re-targeted advertisement selection. The method includes receiving a description of online activities for a collection of online identities for users accessing one or more affiliate web sites. A desired behavior is identified. The desired behavior describes user interaction that indicates that an online identity demonstrates the desired behavior is more likely to be responsive to a re-targeted advertisement. The description of online

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<sup>1</sup> Support for the limitation “receiving a description of online activities for a collection of online identities for users accessing one or more affiliate web sites” is found in Fig. 2 (showing the activity list for several online identities). Support for the limitation “identifying a desired behavior, the desired behavior describing user interaction that indicates that an online identity demonstrating the desired behavior is more likely to be responsive to a re-targeted advertisement” is found, for example, in [0030].

Support for the limitation “analyzing the description of online activities to determine whether a particular online identity appearing in the description of the online activities demonstrates the desired behavior” is found in [0026, 0032].

Support for the limitation “generating a watch list of users to receive re-targeted advertisements based on analyzing the description of online activities” is found in [0041].

Support for the limitation “monitoring, in real-time and from the one or more affiliate web sites, information related to user interaction with the one or more affiliate web sites” is found, for example, in [0031].

Support for the limitation “selecting, in response to the request, advertising content for display based upon determining that the user appears in the watch list of users to receive re-targeted advertisements” is found in Fig. 3 (64), and [0041, 0055].

activities is analyzed to determine whether a particular online identity appearing in the description of the online activities demonstrates the desired behavior. Information related to user interaction with the one or more affiliate web sites is monitored from the one or more affiliate web sites. A watch list of users is generated to receive re-targeted advertisements based on analyzing the description of online activities. A request to display advertising content to a user is received from within the monitored information. It is determined that the user appears in the watch list of users to receive re-targeted advertisements. In response to the request, advertising content is selected for display based upon determining that the user appears in the watch list of users to receive re-targeted advertisements.

As previously noted, Roth describes an advertising server that coordinates advertisers' bids in real time to determine which advertisement to display. (Roth, col. 2, lines 7-19.) When a view opportunity present itself (i.e., when a user accesses a webpage that references the advertising server), the server supplies characteristics of the view opportunity to bidding agents. (Roth, col. 4, lines 26-43). These characteristics include information about the user such as demographic information and other sites the user has visited. (Roth, col. 2, lines 11-19.) The agents bid to display advertisements to the user based on the characteristics of the view opportunity. (Roth, col. 4, lines 26-43.)

In relying on bidding agents, Roth employs an approach that is dramatically different from the approach recited in claim 1. In contrast to Roth's approach which bids viewing opportunities on a request-by-request basis, claim 1 instead recites generating a watch list of users to receive re-targeted advertisements, and, in response to the request, selecting advertising content for display based upon determining that the user appears in the watch list of users to receive re-targeted advertisements. Roth simply does not describe or suggest the approach of claim 1. Accordingly, allowance of claim 1 and its dependent claims is respectfully requested.

Amended independent claims 19, 37, and 55 recite similar limitations and are believed to be allowable for similar reasons. For instance, claim 19 recites that the advertisement server is configured to "generate a watch list of users to receive re-targeted advertisements ... and select, in response to the request, advertising content for display based upon determining that the user appears in the watch list of users to receive re-targeted advertisements." Accordingly, allowance of these amended independent claims and their dependent claims is respectfully requested.

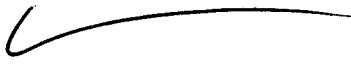
Conclusion

It is believed that all of the pending issues have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this reply should be construed as intent to concede any issue with regard to any claim, except as specifically stated in this reply.

The \$130 Extension of Time fee and the \$810 Request for Continued Examination fee are being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. No other fees are believed due. Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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